On-Site File
Revised 12-11-87.

November 29, 1987

Mr. Robert Bowden
U.S. Environmental Protection Agency
Region V
230 South Dearborn Street
Chicago, Illinois 60606

Dear Mr. Bowden:

On Wednesday, November 18, 1987 a meeting was conducted between the U.S. Environmental Protection Agency (U.S.EPA) On-Scene Coordinators Ross Powers and Robert Bowlus, the Technical Assistance Team (TAT) and the newly awarded cleanup contractor for the Dayton Tire and Rubber facility, PEI Associates (PEI), of Cincinnati Ohio. The meeting was held at PEI's Cincinnati based office at 0900. Persons in attendance, included Mr. John M. Bruck, P.E., Vice-President and Zone III Program Manager for PEI, Mr. William R. Parker, Response Manager for PEI, Kathy R. Nobles of EPA's Technical Assistance Team, and the previously identified OSC's Mr. Ross Powers and Mr. Robert Bowlus.

The purpose of this contract "kick-off" meeting was to allow PEI opportunity to provide the U.S.EPA with items of delivery, pursuant to the cleanup contract (Contract No. 68-WB-0022), and to discuss implementation of the contract. Objectives specifically setforth for the meeting included the following:

- Presentation by PEI to the U.S. EPA, the Site Safety Plan, Extent of Contamination Study and Quality Assurance Project Plan (QAPP), PEI's Proposal for Emergency Response Cleanup at the Dayton Tire Site, and a Task Grouping Flowchart.

- Review the contract and identify specific areas which may need clarification by the Contracting Officer in Washington D.C.

- Formulate a procedure to accurately measure work units on a day-to-day basis for purposes of payment of work performed.

The following is a brief overview of the topics discussed during the meeting. The information presented is supported by notes recorded by the OSC's present and Kathy Nobles of the TAT. The items presented have been grouped according to specific topics relating to the contract.

CHAIN-OF-COMMAND

PEI

John Bruck will serve as the Contract Manager for PEI Associates. His on-site representative will be William Parker, Response Manager and designated Site Safety Officer. Mr. Bruck is not part of the dedicated personnel for the project since he is already dedicated to the ERCS Zonal Contract, however Mr. Parker is. Mr. Louis W. Bruck of PEI has been delegated the responsibility of Senior Foreman along with Mr. W. Ladie of IT Corporation and Mr. Paul Wagner of Safe-T-Environmental, both authorized subcontractors under the contract.

EPA

As specified under the contract, the OSC for the project is Mr. Robert Bowden. His on-site representative will be Mr. Ross Powers, who will be assisted by Mr. Robert Bowlus. PEI was informed that OSC's will be rotated in and out for the duration of the project. It was mutually agreed that the Response Manager will be kept informed as to who is in charge within the EPA on a daily basis. The Contracting Officer for the U.S. EPA is Mr. Stephen B. Manley.

PROJECT MILESTONES

As discussed in the meeting, the maximum contract life is 210 days inclusive of cleanup and disposal of all hazardous materials on site. The effective date of Contract No. 68-WB-0022 is 13 November, 1987. All site activities must be completed by 11 February, 1988, and all other site activities (transportation and disposal) are to be finalized by 10 June, 1988.

SCHEDULE OF WORK

Mr. William Parker outlined the schedule of work activities that are to being on Monday 23 November, 1987 following EPA approval of the Site Safety Plan and Extent of Contamination Plan. Implementation of the Extent of Contamination study is to being on 23 November, 87. During the first week in December no site activities will take place with the exception of mobilization of the crew trailer, decontamination trailer and PEI's office trailer. During this week, PEI also plans on arranging utilities for the respective trailers. If possible they would also like to being drilling well drilling activities.

SITE MANAGEMENT

Under the contract PEI is allowed 90 days of site management for the duration of the contract. Any site management costs beyond

90 days are at cost to PEI. PEI is to begin site management on 7 December, 1987. Items to be covered under site management include the following: mobile lab, office trailers, lunch (crew) trailer decontamination trailer, utilities. Site management is to be billed out at $1,300 a day. The existing guard service will be provided for under the ERCS delivery order until 17 December, 1987. Ross Powers asked if the EPA office trailer is also included in the contractor's site management costs. John Bruck stated that he assumed EPA would pay for the costs of their trailer under the ERCS contract, or by some other internal program. He further stated that the contract does not address an office trailer for EPA. Accordingly, the costs for EPA's phone may also need to be covered under the existing ERCS contract, unless the cost is insignificant enough that it could be paid for as one lump sum with PEI's ordered phone service. R. Powers states that possibly the ERCS contract which is to end 31 December 87, could be extended to cover these costs.

REQUEST FOR DELIVERY ORDER

In instances where the minimum quantity for a single fixed rate unit cost item (as specified in Section B.2 of the contract) will need to be exceeded in order to perform the work, the on-site OSC will request issuance of a Delivery Order to amend the allowable minimum quantity. In this case, Ross Powers would contact Mr. Robert Bowden and make a verbal request for issuance of an amended Delivery Order. If the request is approved, the Delivery Order would be put into writing on-site and sent to either the Contracting Officer or his authorized ordering officer, Mr. Robert Bowden, within 48 hours of the verbal notification. Section G of the contract specifies that Standard Form 30 is to be used to amend an current Delivery Order, however, the form familiar to the parties in attendance is S.F. 1900-59. It was agreed upon that Mr. John Bruck would call the Contracting Officer, Stephen Manley, to seek clarification on this issue. A request for an increase in the maximum order quantities would require that a contract modification be negotiated before the work is actually performed.

The Delivery Order limitations are found on page 63 of the contract Section I.7. The minimum order is $ 1,355.614 and the maximum allowable order shall not exceed $ 5,624.218. Mr. John Bruck explain that these numbers were derived by the Contracting Officer. The methodology presented in PEI's "Best & Final Offer" document was likewise was based on the Government's estimate of $ 3.2 million for the contract.

CONTRACT MODIFICATIONS

In the event a contract modification is required, Mr. John Bruck would adhere to the procedure outlined in the contract. It is

the understanding of the parties present that a contract modification would be required if the maximum quantity for a single fixed rate unit cost item is exceeded for work items B.1 through B.16. The request for modification would be made at the time the work is perrormed, as opposed to being submitted as a contractor claim following completion of the work.

NOTIFICATION OF CHANGES

Section G.9 of the contract directs the contractor to promptly notify the Administrative Contracting Officer in writing, within 15 days of the action, of any Government conduct that the contractor onsiders to constitute a change in the contract. Ross Powers ask that he be notified immediately and prior to this action being taken so that he can correct the situation, if possible, unless of course a contract modification is duly needed in order to perform the work. William Parkers and John Bruck both agreed that the OSC would be notified immediately and prior to elevating a notification of change to the Contracting Officer.

COST TRACKING

Mr. William Parker stated that cost tracking will include the preparation of 1900-55's. As specified in the contract, as each clin item is completed, its lump sum quantity costs will be place on a 1900-55 for the OSC's approval for payment. The minimum order for a single item that can be placed on a 1900-55 is specified on page4 11 of the contract. It was Ross Powers understanding that all labor, equipment and materials costs would also be placed on the 1900-55 and on the Daily Work Report (page 20 of the contract). Mr. Parker stated that he didn't not feel this was appropriate to the job since the items bid on were lump sums with the exception of item B.17. It was agreed that this question would be posed to Stephen Manley, Contracting Office for EPA. A discussion on preparation of the Daily Work Report was conducted and a sample copy was prepared. Each item on the work report will be accompanied by its item no. (i.e. Item B.1 removal of loose asbestos).

PROGRESS REPORTS

As specified in the contract, PEI is to submit weekly progress reports to the OSC throughout the duration of the contract. Ross Powers wanted to know when these reports would be submitted. It was agreed that PEI would submit them on Mondays for the previous week. Initially, the reports would be done on paper, however, they may later be done on a computer.

WORK SCHEDULE AGREEMENTS

Mr. Powers asked what was the planned length of work day was. Mr. Parker said that he would prefer to initially work 10 hour days, with an 1 hour unpaid lunch. Two 15 minute breaks will be paid, however when they would be taken may be dictated by the Site Safety Plan. Mr. Powers also asked John Bruck if travel time to the project site to be part of overhead incurred by PEI or is it part of the cost for per diem. Mr. Bruck stated that it is part of PEI's overhead, with the exception of work performed in relation to item B.17. Section B.1, subsection 3 outlines the accounting procedures in affect for item B.17.

The schedule for holidays was discussed and agreed upon. Thanksgiving - no work 25/26 November; Christmas - no work December 25, however, PEI has not made a determination on any other days near Christmas; Martin Luther King Day - 18 January work is scheduled; Presidents Day - 15 February, work scheduled.

DELIVERABLE ITEMS

Ross Powers asked if the Site Safety Plan that was provided to him during the meeting, was written in accordance with the guidelines setforth in the Solicitation for Bid. The Response Manager stated that it had been. Ross Powers also asked if the contractor required any government furnished data for the Site Safety Plan. Mr. John Bruck stated that no data was required from the government and that the Safety Plan had been prepared pursuant to OSHA guidelines. Robert Bowlus informed William Parker that radios for on-site communication need to be present on-site and discussed in the site safety plan. Mr. Parker stated that they would be made available on site and also discussed in the site safety plan.

EXTENT OF CONTAMINATION STUDY

Mr. William Thompson of PEI outlined the extent of contamination study to be implemented at Dayton Tire. The study will address four specific areas of concentration: dioxin, PCBs, asbestos, and other hazardous contaminants present onsite. In order to accomplish the study PEI will collect swipe samples of the interior of the facility, soil samples, bulk asbestos samples, liquid samples, and well samples.

Monitoring Well Program: As part of the Extent of Contamination Study, PEI plans to install approximately 10 monitoring wells. The well installation may begin as early as the week of 30 November, 87 however, this schedule was only tentative. Ross Powers asked what the results of the monitoring wells will be used for. He was told that the results would crudely indicate what type and how much contamination is present in the underlying aquifer. The contract does not, however, address groundwater

cleanup. Mr. Bowlus stated that the well drillers must be health monitored pursuant to OSHA regulations (1910.120). PEI agreed that only health monitored drillers would be used.

Dioxin/PCB Study: The specifics of the sampling has been discussed in the sampling document prepared by PEI. Briefly discussed during the meeting was the major highlights of the studies. For the dioxin extent of contamination study, 2 swipe samples are to be collected and later split for PCB/Dioxin analysis. Only approximately 5 % of the samples would be analyzed for dioxin; the remainder would be analyzed for dioxin. If the initial PCB analysis indicates that there are no PCB present, then no dioxin analysis would be performed for that sampling station. The determination as to which samples would analyzed for dioxin would be based upon the PCB/dioxin equivalencies. The dioxin study therefore is based on PCB levels, with dioxin confirmation. All samples would be collected at the same time, however, the dioxin samples would have a longer holding time. It is PEI's judgment that the holding time would not affect the quality of the analysis. The dioxin samples would be analyzed for Tetra through Octa families only, unless the results of this analysis indicates that isomer specific analysis is needed to further define the contamination.

Dr. Michael Taylor, of PEI, joined the meeting to answer some question concerning dioxin formation from PCBs. Dr. Taylor has conducted extensive research in the field of dioxin contamination and therefore is a good information source. Ross Powers asked Dr. Taylor how much PCB would volatilize during a fire, since a significant amount of ceiling and wall areas throughout the building was soot covered. Dr. Taylor stated that a significant amount PCB could volatilize, thereby resulting in widespread contamination from soot. Dr. Taylor also stated that it is possible to have PCB levels below the cleanup standard, but have dioxin levels that exceed the allowable standards. Therefore, it is important to look closely at the results of the PCB results before automatically assuming that low PCB levels indicate no dioxin are present.

Asbestos: The asbestos extent of contamination study would consist of the collection of bulk asbestos samples from areas suspected as containing asbestos. The Regional Air Pollution Control Agency (RAPCA) has previously shown interest in assisting the asbestos bulk sampling effort, and may therefore be called upon to provide their input into the sampling program.

QA/QC PLAN

PEI has included a quality control check into the plan that calls for 10% duplicate samples to be taken for all samples collected. Ross Powers asked if additional samples, amounting to 10% duplicate samples, could be collected for a separate quality control check for the EPA. It was agreed that PEI would collect

the EPA samples, however, the cost for analysis for the duplicate samples would paid for out of a special projects fund set up by the EPA.

John Bruck of PEI requested clarification of the cleanup standards for dioxin and PCBs. In particular the cleanup criteria has not been established for dioxin. Ross Powers stated that he would try to assist in providing this information to them.

CLEANUP AND ON-SITE TREATMENT

PEI outlined their plans for on-site treatment of PCB oil that is less than 1100 ppm in concentration. The "kapec" system to be used can treat 3,000 gallon batches of oil down to 2 ppm. Existing drums of oil on-site that exceeds 1100 ppm, will have to be disposed of off-site at an approved treatment facility. All contaminated drums, once emptied, would be crushed and disposed of under line item B.9.1 as contaminated debris. Contaminated debris would be hauled off site in roll off boxes.

PCB contaminated water will be treated down to 1 ppb or less. It may be possible to obtain a discharge permit from the Ohio Environmental Protection Agency (OEPA) to allow the clean water to be discharged into Wolf Creek. Otherwise, the cleaned water may be sprinkled on to the soils on site for disposal. Additional information is needed by the contractor and the OSC's before a final decision on water disposal can be made.

Dioxin contaminated debris would be placed in 1 cubic yards bags and disposed of on-site inside a dioxin containment facility. Asbestos would likewise be bagged and hauled off-site for proper disposal. Kathy Nobles of the TAT asked what disposal guidelines would be used for asbestos also contaminated with PCB. Additional clarification on this issue will have to be sought, since it was unknown what regulations would have to be followed.

The meeting was adjourned at approximately 1700 hours. OSC Powers informed PEI that the Site Safety Plan and Extent of Contamination Plan would be reviewed and comments returned to them by Monday, November 23, 1987.

Ross Powers, OSC

Robert Bowlus, OSC